

Exhibit D

MILBERG TADLER PHILLIPS GROSSMAN LLP

NEW YORK

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August 2, 2018

VIA EMAIL

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Re: *In re Dealer Management Systems Antitrust Litig.*,
MDL No. 2817, Case No. 18-CV-864 (N.D. Ill.)

Dear Leo and Brian:

This will respond to your July 31st letter regarding Reynolds' Responses and Objections to Dealership Plaintiffs' Requests for Production. We write to address issues and specific Requests where we believe clarification is needed in advance of the August 6, 2018 deadline for motions to compel. We request that you respond to us by **tomorrow, Friday August, 3, 2018**, regarding the items below.

Pre-2013 Timeframe: Please advise whether Reynolds is agreeable to producing the following categories of documents without any date limitation:

- All documents reflecting communications between Reynolds and CDK about blocking Third Party Integrators' access to Dealer DMS data (Request No. 2); and
- All documents regarding changes to CDK's data access policies (Request No. 5).

Request Nos. 9 and 12: We have offered to narrow these Requests to avoid the need for motions to compel. But we reserve our rights to revisit these Requests in event that continued discovery (*i.e.*, oral discovery) reveals additional relevant documents that are responsive to our Requests as originally worded, but are not captured by our Requests as narrowed. It appears you are refusing

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to produce any documents responsive to this Request based on this reservation of rights. Unless you reconsider your position, it appears we are at an impasse.

Request Nos. 10 and 18: You have refused to review your centralized sales call note database for documents responsive to these Requests. Accordingly, it appears we are at an impasse.

Request Nos. 33 and 34: You have not agreed to produce any of the enumerated categories of documents that we asked you to provide in response to these Requests. Accordingly, it appears we are at an impasse.

Request Nos. 36 and 44: Please clarify the following:

1. Does the data produced at REYMDL0037507 reflect *all* amounts invoiced to, and *all* amounts paid by, RCI customers from January 2010 to December 2017?
2. Is Reynolds agreeable to producing additional data reflecting *all* amounts invoiced to, and *all* amounts paid by, RCI customers from the end date of REYMDL0037507 to present?
3. To what extent is “the data that would have been included in the invoices” for TrueCar, Carfax, Autotrader, Cars.com, vAuto, Dealer.com, DealerSocket, RouteOne, NakedLime and DealerRater *not* included in REYMDL0037507?

Again, to avoid unnecessary motion practice on these Requests, we ask that you kindly respond to us by tomorrow, Friday, August 3, 2018, at 5PM EST. We are available to speak with you by phone regarding these Requests today or tomorrow if you prefer.

Sincerely,

/s/ Robert A. Wallner
Robert A. Wallner

CC: Derek T. Ho
Michael Nemelka

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